MUNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

Rachael Griffin-El ex rel RACHAEL GRIFFIN, Plaintiff.

v.

FRANKLIN CREDIT MANAGEMENT CORPORATION, THOMAS J. AXON. JPMORGAN CHASE & CO., JAMIE DIMON. Defendants.

United States Courts Southern District of Texas FILED

JUN 0 6 2025

Nathan Ochsner, Clerk of Court

Civil Action No. 4:25-cv-2013

PLAINTIFF'S REQUEST FOR ENTRY OF DEFAULT

TO THE HONORABLE CLERK OF THE COURT:

NOW COMES Rachael Griffin-El ex rel RACHAEL GRIFFIN, a living woman, sui juris, in propria persona, and hereby respectfully requests that the Clerk of the Court enter Default against the above-named Defendants pursuant to Federal Rule of Civil Procedure 55(a), for failure to plead or otherwise defend this action as required by law. In support of this request, Plaintiff states the following:

- 1. The Summons and Complaint were duly served on Defendants Franklin Credit Management Corporation, Thomas J. Axon, JPMorgan Chase & Co., and Jamie Dimon on or about May 14,2025.
- 2. More than 21 days have elapsed since service of process upon the Defendants, and they have failed to file any responsive pleading or motion as required by Rule 12 of the Federal Rules of Civil Procedure.
- 3. As of the date of this request, no Defendant has filed an Answer, Motion to Dismiss, or other responsive document. nor have they entered an appearance in this matter.

WHEREFORE, Plaintiff respectfully requests that the Clerk of Court enter default against all Defendants pursuant to Rule 55(a) of the Federal Rules of Civil Procedure.

Respectfully submitted. Dated June 6,2025

Rachael Griffin-El ex rel RACHAEL GRIFFIN

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